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 James Dzurenda, Michael Minev,
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 and Kenneth Williams*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

GREGORY BOLIN,
 Plaintiff,

v.

DR. KOEHN, *et al.*,
 Defendants.

Case No. 3:23-cv-00168-MMD-CLB

**ORDER GRANTING JOINT
 STIPULATION FOR EXTENSION
 OF TIME TO FILE RESPONSE
 TO MOTION FOR PRELIMINARY
 INJUNCTION (ECF No. 58)
 (Second Request)**

Plaintiff, Gregory Bolin, by and through counsel, Julie D. Cantor, J. Cantor Law, and Paula M. Armeni, Clark Hill, PLC, and Defendants James Dzurenda, Michael Minev, Ted Hanf, Harold Wickham, Charles Daniels, and Kenneth Williams, by and through counsel, Aaron D. Ford, Nevada Attorney General, and Douglas R. Rands, Senior Deputy Attorney General, of the State of Nevada, Office of the Attorney General, hereby submit this *Joint Stipulation for Extension of Time to File Response to Preliminary Injunction*.

MEMORANDUM OF POINTS AND AUTHORITIES

I. BACKGROUND AND RELEVANT PROCEDURAL HISTORY

Mr. Bolin filed this case alleging violations of his constitutional rights. (ECF Nos. 5 & 60) Defendants have accepted service. (ECF Nos. 13 & 65) On or about March 25, 2024, this Court issued a Scheduling Order and Discovery Plan. (ECF No. 29) Mr. Bolin filed a Motion for Preliminary Injunction on June 2, 2025. (ECF No. 58) The response was due on

1 June 16, 2025. This Court granted one extension of time to July 11, 2025 to file the
2 response. (ECF No. 64) In preparation for filing the response, Counsel for the Defendants
3 reviewed the requests which serve as the basis for the Motion for Preliminary Injunction.
4 The NDOC can likely agree to the substance of the requests. However, additional time will
5 be necessary to work out the details and arrive at an agreement with both sides. The
6 Parties believe it is possible that an agreement can be reached that will satisfy both sides
7 and obviate the necessity for the Court to decide the motion. Therefore, the Parties request
8 additional time for the response.

9 **II. APPLICABLE LAW FOR MOTION TO STAY DISCOVERY**

10 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as
11 follows:

12 When an act may or must be done within a specified time, the
13 court may, for good cause, extend the time: (A) with or without
14 motion or notice if the court acts, or if a request is made, before
15 the original time or its extension expires; or (B) on motion made
after the time has expired if the party failed to act because of
excusable neglect.

16 Defendant's request is timely and will not hinder or prejudice Mr. Bolin's case but will
17 allow for a thorough opportunity to respond to the motion. The requested extension of time
18 should permit the Defendant time to adequately gather the required exhibits and prepare
19 the response. Defendant asserts that the requisite good cause is present to warrant the
20 requested extension of time. The parties are working on a resolution of the underlying
21 issue contained in the Motion for Preliminary Injunction. This is the second extension
22 request on this response and is made in good faith.

23 **III. CONCLUSION**

24 Defendants assert that the requisite good cause and extenuating circumstances are
25 present to warrant the requested extension of time. Therefore, Defendants request an
26 extension to file their response to Plaintiff's Motion for Preliminary Injunction. The Parties

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request an extension of 30 days, or to **Friday, August 11, 2025**, for the Defendants to file their response.

DATED this 9th day of July, 2025.

DATED this 9th day of July, 2025.

J. CANTOR LAW
CLARK HILL PLLC

AARON D. FORD
Attorney General

By: /s/ Julie D. Cantor, MD, JD

Julie D. Cantor MD, JD
Paola M. Armeni, Esq.

Attorneys for Plaintiff

By: /s/ Douglas R. Rands

DOUGLAS R. RANDS, Bar No. 3572
Senior Deputy Attorney

Attorneys for Defendants

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: July 10, 2025